

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JENNIFER ECKHART, et ano.

Plaintiffs,

v.

FOX NEWS NETWORK, LLC, et al.,

Defendants.

Case No. 1:20-cv-05593

**MOTION AND DECLARATION  
PURSUANT TO LOCAL RULE 1.4 FOR  
LEAVE TO WITHDRAW AS  
ATTORNEY OF RECORD**

I, Jon A. Sale, an attorney of record for Defendant Edward “Ed” Henry in the above-styled action, hereby move the Court pursuant to Local Rule 1.4 for an order, substantially in the form attached hereto as **Exhibit A**, granting leave for me to withdraw as attorney of record. In support thereof, and pursuant to 28 U.S.C. § 1746, I declare as follows:

1. Mr. Henry is aware that I’m filing this Motion requesting that my firm’s representation of him in this matter shall end. Mr. Henry no longer requires representation by my firm given his continued representation by Elkan Abramowitz, Esq., Catherine Foti, Esq., and Michael Manzo, Esq., of the law firm Morvillo, Abramowitz, Grand, Iason, & Anello P.C. (“The Morvillo Firm”).

2. At this time, The Morvillo Firm is continuing to represent Mr. Henry in this action.

3. The Morvillo Firm attorneys are fully familiar with the litigation and proceedings to date.

4. Because, at this time, Mr. Henry will continue to be represented by knowledgeable counsel, I respectfully submit that my withdrawal as counsel of record will not affect this action in any way, will not alter the posture of the case, and will not prejudice any party.

5. I am not asserting a retaining or charging lien.

6. For the foregoing reasons, I hereby request that I be removed as counsel of record from the Electronic Case Filing (“ECF”) system, and that no further documents, notices, or other pleadings in this action be served upon me.

7. The filing of this Motion electronically using the Court’s ECF system constitutes good and proper service on all parties and their registered attorneys of record. A copy of this Motion and Exhibit A has also been provided to Mr. Henry.

8. I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: January 25, 2023

By: /s/ Jon A. Sale  
Jon A. Sale